Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Application by BellSouth Corporations, BellSouth Telecommunications, Inc. and BellSouth Long Distance, Inc. for Provision of In-Region, InterLATA Services in Louisiana	)))))	CC Docket No. 98-121

AFFIDAVIT OF WILLIAM N. STACY

FILED AUGUST 28, 1998
(REPLY)

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William N. Stacy, being duly sworn, deposes and says:

1. My name is William N. Stacy. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. I am the Operations Vice President - Services for the Interconnection Operations department of BellSouth Telecommunications, Inc. (BellSouth). I provided affidavits on Operations Support Systems (OSS) and Performance Measurements in BellSouth's initial Section 271 application filed at the FCC on July 9, 1998.

I. PURPOSE OF THE AFFIDAVIT

2. I provide this affidavit to respond to the comments and affidavits submitted by other parties regarding OSS. Specifically, this affidavit clarifies issues as required, and corrects certain "facts" cited by the commentors. First, I

address some general issues relating to access to BellSouth's OSS. Second, I address comments related particularly to pre-ordering, ordering and provisioning, maintenance and repair, and, testing, capacity, and usage. In a separate reply affidavit, I have responded to issues relating to performance measurements.

II. GENERAL

3. Sprint asserts that BellSouth's OSS interfaces do not met the standard of nondiscriminatory access because the interfaces introduced by BellSouth to date are not fully deployed and tested, and that BellSouth's OSS interfaces are only interim solutions. (Closz Affidavit, ¶¶ 5-13). Contrary to Sprint's assertions, BellSouth's interfaces have been fully tested and have been deployed in a "real world" environment, as shown by the information provided in my initial OSS Affidavit in this docket. The interfaces BellSouth has provided (*e.g.*, LENS, CGI, EC-Lite, EDI, TAFI, ECTA, ODUF, ADUF, etc.) either conform to industry standards or were provided in advance of such standards at a time when none existed. In certain cases, the interface provided by BellSouth has significantly greater functionality than the industry standard; even in these cases, BellSouth has offered both interfaces (for example, both TAFI and the industry-standard ECTA interfaces for repair and maintenance). Although Sprint insists that "long term" or "permanent" interfaces are only those that conform with industry standards and provide "full systems flow through"

(*i.e.*, machine-to-machine interfaces) this is merely Sprint's opinion. Such interfaces have not been mandated by the Act, the FCC, or any state commission. (Nonetheless, it should be noted that BellSouth has machine-to-machine interfaces in place for pre-ordering, ordering and provisioning, and maintenance and repair.)

4. AT&T claims generally that BellSouth delayed developing interfaces years ago, in 1996. (Augier Affidavit (AT&T) ¶¶ 36-37, Attachment 7). That is not correct. BellSouth began its development of interfaces in 1996, and implemented two in that year. ODUF, a billing interface, was implemented in March, 1996, and EDI, an ordering interface, was implemented in December, 1996. On March 31, 1997 and on April 28, 1997, respectively, TAFI, a repair and maintenance interface, and LENS, a pre-ordering interface, were implemented. Deployment of new and improved interfaces has continued at a steady pace since that time, consistent with CLEC requests for enhanced capabilities.

III. PRE-ORDERING ISSUES

A. ISSUES REGARDING INDUSTRY STANDARDS FOR PRE-ORDERING, INTEGRATION, AND THE FORTHCOMING TAG (A.K.A. "API") INTERFACE

5. Ignoring the facts contained in BellSouth's descriptions of the LENS CGI and EC-Lite interfaces (see, Stacy OSS Affidavit, ¶¶ 17, 20-25, 107-117)

(App. A, Tab 22), numerous commentors have complained that BellSouth has not provided an integrated, machine-to-machine pre-ordering and ordering interface. (e.spire at 31-32; Intermedia at 11; Sprint at 28-31; MCI Comments at 58; Green Affidavit (MCI) ¶¶ 31, 39-40; AT&T Comments at 41; Bradbury Affidavit (AT&T), ¶¶ 13, 157-158; Rozycki Affidavit (ALTS), ¶ 10). The commentors cannot point to any requirement in the 1996 Act or in any FCC Order that makes BellSouth responsible for performing this "integration" of systems. Such requirement is simply not there. MCI has even noted, in an *Ex Parte* filed at the FCC on April, 28, 1998, that "MCI agrees that it is the CLEC's responsibility to perform the actual integration . . ." (Exhibit WNS-Reply-1). Indeed, by requiring that BellSouth provide CLECs with "the necessary technical specifications to develop such an interface," it is clear that the FCC intended that CLECs, and not BellSouth, would perform the necessary integration. Memorandum Opinion and Order, *In the Matter of Application by BellSouth Corporation, et al. Pursuant to Section 271 of the Communications Act of 1934, as amended, to Provide in-Region, InterLATA Services in Louisiana,* CC Docket No. 97-231, ¶54 (rel. Feb. 4, 1998) ("Louisiana Order"). In accordance with the FCC's requirements, BellSouth provided CLECS with all necessary technical specifications for EDI, as well as pre-ordering interfaces that can be integrated with the EDI ordering interface. (Stacy OSS Affidavit, ¶ 21).

6. Numerous commentors have thus complained that the integratable pre-ordering interfaces provided by BellSouth (CGI and EC-Lite), are not industry standard (Sprint at 31; Green Affidavit (MCI), ¶¶ 54-63). BellSouth has never denied this and has explained clearly the situation regarding industry standards when these interfaces were developed. (Stacy OSS Affidavit ¶ 13). Since BellSouth filed this Application, however, there has been a change, as explained below.

7. The DOJ's footnote 51 quotes some CLECs that state that BellSouth does not yet have a "proven" application-to-application interface. This is incorrect insofar as the DOJ refers to the portion of the interface under BellSouth's control. (Stacy OSS Affidavit, ¶¶ 24, 213). It is important to note that a "proven" application-to-application interface requires development on the CLECs' part, which except for AT&T and one other CLEC, they have chosen not to do.

8. As Sprint and OmniCall indicate, BellSouth is building an Application Programming Interface (API) for pre-ordering and eventually, ordering, which BellSouth now calls "TAG" or the Telecommunications Access Gateway. (Closz Affidavit (Sprint) ¶ 13; OmniCall Comments at 2-3). TAG was not discussed in BellSouth's filing on July 9, 1998, because the release of the pre-ordering portion of the interface is not scheduled to occur until August 31, 1998. However, since Sprint and OmniCall have mentioned the TAG interface, I will address it now. The following

discussion regarding BellSouth's decision to use the CORBA (Common Object Request Broker Architecture) standard for this interface, and to build a TAG interface using EDI TCP/IP/SSL3 also will rebut MCI's statements regarding BellSouth's alleged refusal to implement EDI TCP/IP/SSL3 as a pre-ordering standard. (MCI at 57; Green Affidavit ¶¶ 35-38 and 58-60).

9. TAG is based on the CORBA standard. At the time BellSouth decided to build TAG, the OBF industry subcommittee was (and still is) considering two potential standards for pre-ordering: CORBA and EDI TCP/IP/SSL3. (Stacy OSS Affidavit, ¶ 13). Because the Electronic Communications Implementation Committee ("ECIC") indicated last fall that CORBA would likely be the *single* long-term pre-ordering standard, BellSouth decided to use CORBA rather than EDI TCP/IP/SSL3 standard for TAG. On or about July 9, 1998, the day BellSouth filed this Application, ECIC approved EDI TCP/IP/SSL3 as one of the standards for pre-ordering. The committee will vote on CORBA in late August, 1998, and BellSouth expects it to be approved as well. The vote was originally scheduled for August 24, 1998. MCI, however, blocked the vote, and it is now scheduled for August 28. MCI states that BellSouth "has not indicated that it is willing to move forward with EDI TCP/IP." (MCI Comments at 57). This is not the case. As MCI should know, a week before MCI filed its comments, on July 28, 1998, BellSouth met with representatives of MCI regarding building

another pre-ordering interface using this standard. Also, BellSouth has stated before the FCC and state commissions many times that it "will implement the standards that the industry establishes for pre-ordering, as it will implement new industry standards for all OSS functions when they are developed." (Stacy OSS Affidavit, ¶ 13).

10. OmniCall states that BellSouth "recently informed OmniCall that it would not release critical programming data [for TAG] to OmniCall until it was ready for public release" and, "[t]herefore, OmniCall's support of TAG was wasted." (OmniCall Comments, at 2-3). These remarks are puzzling. BellSouth told OmniCall and two other CLECs on May 13, 1998, not *recently*, that the TAG Reference Guide would not be ready until August 15, 1998. Nevertheless, OmniCall has continued to participate in the project, including attending a training class on July 21, 1998. Also on July 21, 1998, BellSouth took OmniCall, at its request, to BellSouth's test lab for TAG, for a demonstration of part of the TAG configuration. The TAG Reference Guide has been released, as scheduled.

B. SPECIFIC ISSUES RELATED TO THE CGI MACHINE-TO-MACHINE INTERFACE

11. Several CLECs, including AT&T, MCI, and e.spire, complain that the use of the CGI specification will not result in a non-discriminatory interface, and criticize the report produced by Albion, Inc. (AT&T Comments at 33-

34, 41-42; Bradbury Affidavit, ¶¶ 159-166; Green Affidavit (MCI), ¶¶ 31, 45, 51-53; e.spire Comments at 31-32). The CGI specification allows CLECs to build a machine-to-machine pre-ordering interface that permits them to manipulate the data they receive from LENS in whatever manner they wish, including integration with EDI. Albion's report and software prove that the CGI specification has these capabilities, as described in the text of my initial affidavit at ¶¶ 110-112, in Exhibit WNS-19, and as summarized below. While it is true that Albion built an interface for one type of order (new residence orders, as noted in Stacy OSS Affidavit at ¶ 110), the interface built by Albion could be easily and quickly adapted for other types of orders now that the initial work has been done. As stated in my initial affidavit at ¶ 111, Ernst & Young, LLP included certification of Albion's work in its report attached to the Affidavit of John Putnam (App. A, Tab 15).

12. I will briefly describe Albion's work again, and discuss its applicability. Through Albion's work, BellSouth has demonstrated that a CLEC's software developer has sufficient information to build a Common Gateway Interface to BellSouth's pre-ordering systems that can:

- retrieve a Customer Service Record (CSR) and parse (break down) elements of that data;
- validate a service address and retrieve that data in fully parsed form;

- obtain and reserve telephone numbers;
- obtain and utilize interexchange carrier availability data for a particular central office;
- obtain and utilize features and services data for a particular central office;
- obtain the next available dispatch date from BellSouth's dispatch appoint scheduling system;
- and, integrate all of these elements with other items input by a CLEC service representative to build an EDI order.

13. The functionality demonstrated here is not limited to the new residential order that was part of the prototype. All of these pre-ordering functions are used similarly for all types of residential and business orders. For example, a CLEC wishing to place a "Convert-as-is" business order needs a valid address for the order (obtained via CGI from RSAG); the customer's listed name, listed address, billing name, and billing address (obtained via CGI from the Customer Service record). Similarly, for a business "Convert-with changes" order, all of the items listed above are needed, and in addition, the customer's existing service and equipment items (obtained via CGI from the Customer Service Record) are required (to indicate which features are being changed).

14. CGI provides the functionality for the CLEC to obtain all of this information in a form that can readily be used to populate the data in the CLEC's ordering system. This work (the integration) is the responsibility of the CLEC.

15. Several commentors complain specifically that the CGI will not provide a non-discriminatory interface because of an underlying HTML data stream. They comment that it is not different from the HTML parsing that the FCC rejected in BellSouth's South Carolina Application. (Bradbury Affidavit (AT&T) ¶¶ 159-166; AT&T at 33-34, 41-42; Green Affidavit (MCI) ¶¶ 31, 45, 51-53). In its South Carolina Order, the Commission concluded that BellSouth had not demonstrated that its CGI at that time could be used to show the existence of a machine-to-machine pre-ordering interface. In particular, the Commission was concerned about the applicability of "HTML parsing" to an effective pre-ordering system. Since the time of the South Carolina Order, the functionality of BellSouth's CGI has been demonstrated by the development work conducted by Albion, Inc. as above. That work demonstrates that the CGI interface, using HTML, indeed provides the pre-ordering functionality required for a machine-to-machine interface, and that any concerns of the CLECs or the Commission about the use of HTML in this application were simply unfounded.

16. AT&T states that Albion "is not a real CLEC" and "[c]onsequently, the 'internal CLEC information systems' used in the Albion project must have been designed (if not actually constructed) by BellSouth itself." (Bradbury Affidavit (AT&T), ¶ 160; see also footnote 82). Albion may not be "a real CLEC," but it performed exactly the work a CLEC would perform to build CGI. BellSouth did not design or build Albion's "internal CLEC information systems." Albion provided its own, as described in Exhibit WNS-Reply-2 (Deposition of Greg Berman and Jack Runnels of Albion).

17. MCI (and others) have complained that they are unable to parse the data in the Customer Service Record (CSR) needed to populate orders. (MCI Comments at 56-57, Green Affidavit, ¶¶ 46-50). This is simply incorrect. The data in the CSR can be parsed to exactly the level need in an order, as I discussed above, and this is done exactly as BellSouth parses CSRs in its own retail operations. The Albion report confirms that CLECs can parse CSRs to the extent required for integration with EDI. What MCI wants to do is to parse the data to a level MCI can use to build its own customer records system – far beyond the level ordering requires, and far beyond the level BellSouth retains. For example, BellSouth retains the customer's listed name as an complete field – my listed name is "Stacy, William N." MCI, however, wants to parse this into three separate fields: last name, first name, and middle initial. While I understand that MCI wants this for its own business purposes, this level of parsing is simply not

required to place the required name data in an order – what is required is the complete field as provided by BellSouth to CLECs and itself, on a non-discriminatory basis.

18. BellSouth did not overstate OmniCall's success with the CGI interface in its application. (OmniCall Comments at 1-2). BellSouth simply stated that OmniCall had implemented an interface using the CGI specification, and that it had used the interface to make customer service record queries. (Stacy OSS Affidavit, ¶ 113). BellSouth responded to OmniCall's concerns about confidential information in a communication sent directly to OmniCall.

19. The CGI specification was up-to-date at the time of BellSouth's Application. The updated specification for the July 24, 1998 release (3.0) has been delivered to the CLECs, including MCI, that are either using or planning to implement CGI. The CGI specification for Release 3.1 (August 15, 1998) is on BellSouth's Interconnection Web site.

C. TELEPHONE NUMBER SELECTION

20. With respect to the selection of telephone numbers, AT&T and MCI complain that CLECs have no way of viewing through either EC-Lite or LENS all NXXs available in a central office to serve a specific customer, and that CLECs' access to the Local Exchange Routing Guide ("LERG") for this purpose is not comparable to the information on a BellSouth's

customer service representative's screen. (Bradbury Affidavit (AT&T) ¶ 154; MCI Comments at 59; Green Affidavit (MCI) ¶¶ 72-73). To clarify what was explained in the Stacy's OSS Affidavit at ¶ 39, it should be noted that BellSouth's own information comes from the LERG, which BellCore makes available to all CLECs. CLECs may take the information contained in the LERG and incorporate it into their own internal OSS, as BellSouth has done.

21. KMC claims that, on numerous occasions, telephone numbers assigned by LENS have turned out to be invalid. (KMC at 22; Davis Affidavit (KMC) ¶ 13). KMC has not provided any specific information about this problem, nor, to my knowledge, has KMC complained to BellSouth about this situation. Since telephone numbers may be reserved for 30 days in the inquiry mode of LENS or 90 days in the firm order mode (see Stacy OSS Affidavit, ¶ 37), it is possible that the reservation period had expired for the numbers selected by KMC. This, however, is necessarily speculation given the absence of any detail in KMC's comments.

D. AVAILABILITY OF SWITCH-BASED FEATURES AND SERVICES

22. In spite of the explanation in ¶ 48 of my OSS Affidavit, AT&T continues to complain that it does not have the same access as BellSouth to the information on ringing patterns for lines with RingMaster® service. (Bradbury Affidavit (AT&T), ¶ 154). Just as BellSouth representatives

access this information from an on-line guide, CLECs, too, can choose to access this information from the on-line form of the LEO Guide (which may be downloaded by the CLEC from BellSouth's Interconnection Web site).

23. AT&T complains that EC-Lite does not provide the implementation dates for new services at a central office. (Bradbury Affidavit (AT&T) ¶ 154). This is not so. EC-Lite, LENS, and CGI all provide access to P/SIMS, the products and service database, which contains this information.

E. CUSTOMER SERVICE RECORD INFORMATION

24. Intermedia complains that, once it has ported a number from BellSouth to itself, it can no longer view the CSR for that customer via LENS, and it must go to its BellSouth account representative for the CSR. (Intermedia Comments at 11). This is not true. BellSouth investigated this complaint and found that Intermedia had been attempting to view the CSR before the ordering process was completed.

25. ITC DeltaCom claims that CSRs are not updated in a timely manner. (Rozycki Affidavit (ALTS/ITC DeltaCom) ¶11). Several representatives of BellSouth met with ITC DeltaCom about this and other issues on July 29-30, 1998. BellSouth explained to ITC DeltaCom that it usually takes 24 hours from the time a correct order has been completed before an updated CSR appears. This is the same for CLECs as it is for BellSouth.

Errors on an order can delay the posting of an updated CSR, even though the end user's service could be working.

26. AT&T pointed out to BellSouth that EC-Lite and LENS do not allow CLECs to view the CSRs for customers served through UNEs. (Bradbury Affidavit (AT&T) ¶¶ 118, 142-144; AT&T at 38 & 41). This problem was fixed by BellSouth. CSRs for customers served by UNEs are now available via LENS, CGI, and EC-Lite.

27. AT&T complains that EC-Lite presents CSR information in an unusable format. (Bradbury Affidavit (AT&T) ¶ 118; AT&T at 41). BellSouth disagrees. The information is presented in the same format as it is presented in RNS, BellSouth's sales negotiation system for residential orders. Please also see my related discussion above regarding the parsing of CSRs.

F. OTHER PRE-ORDERING ISSUES

28. MCI implies that BellSouth has resisted providing MCI a download of the RSAG database, even though the Georgia Public Service Commission has ordered it. (MCI at 60; Green Affidavit (MCI) ¶¶ 64-66). This is not so. As BellSouth has already explained, it is preparing the download for MCI. (Stacy OSS Affidavit at 13 (matrix) and ¶ 70).

29. AT&T, which stopped using EC-Lite in mid-July, 1998, complains that EC-Lite does not provide an end user's billing telephone number. (Bradbury Affidavit (AT&T) ¶¶ 118, 145-153; AT&T at 41). Users of EC-Lite, LENS, and CGI must obtain this number from their customers, because the billing telephone number will give a CLEC access to any and all accounts under that number, including accounts that the CLEC might not be servicing. By asking the customer for this number, the CLEC receives the end user customer's authorization to access accounts for which the CLEC may not be providing service.

30. MCI complains that CLECs cannot use LENS to determine a customer's local tax status. (Green Affidavit (MCI) ¶ 85). The end user customer's tax status is immaterial to the pre-ordering process. Local tax status is a required field for orders, but this is the CLEC's tax status, not the end user's.

31. MCI complains that CLECs are unable to obtain information on BellSouth's retail promotions via LENS. (MCI at 59-60; Green Affidavit (MCI) ¶ 86). This information is made available to CLECs through state tariffs, which CLECs may obtain from BellSouth via the Internet at http://cpr.bst.bellsouth.com/index2.html. Additionally, BellSouth sends this information to MCI and AT&T via e-mail, as specified in their interconnection agreements. CLECs may incorporate this information on promotions into their own internal OSS, if they wish, as BellSouth has.

32. MCI also complains that BellSouth does not provide CLECs a way of determining which service provider is furnishing particular network elements to service the customer. MCI's Green ¶ 88. MCI suggests that this kind of inquiry might be essential where, for example, "carrier A furnishes the loop, carrier B furnishes the switching capability, and carrier C furnishes directory assistance services." This situation, as hypothesized by MCI, does not exist, and there are currently no standards for handling this kind of inquiry, nor has any CLEC proposed it to the Electronic Interface Change Control Committee or to the national standards groups. BellSouth, of course, would be willing to consider proposals by CLECs to implement such functionality, however, BellSouth maintains, as it did in the Stacy OSS Affidavit at ¶ 74, that this functionality is not necessary to provide CLECs with a meaningful opportunity to compete today.

33. It is important to note that BellSouth believes that it is obligated only to disclose elements that it controls, with permission from the end user customer. If, for example, BellSouth provided the loop, carrier A provided the switching, and carrier A contracted directory assistance services to carrier B, BellSouth would only have certain information it could provide to carrier X (the carrier making the inquiry).

BellSouth would have information on the loop.

BellSouth would be able to provide a record showing that carrier A had a cross connect with BellSouth, but would not have information on what vertical services carrier A might be providing to the end user customer.

BellSouth would have information showing carrier A provided directory assistance, but not that it was contracted to carrier B.

In this, and other similar situations, carrier X would have to get information on the UNEs from directly from its customer or from carrier A or B.

IV. ORDERING ISSUES

A. EDI ISSUES

34. Intermedia complains that it has had problems with orders sent via EDI-PC, that orders have been "lost" when sent via EDI, and that BellSouth shifts the blame for these problems to Intermedia. (Intermedia at 11-13). One of Intermedia's witnesses has made these same accusations during hearings before state public service commissions, but has never provided any specific information that BellSouth could use to investigate or refute Intermedia's charges about EDI orders. Except for some problems with "lost orders" in November, 1997, Intermedia has not made any informal or formal complaints about lost EDI orders to BellSouth. BellSouth met with Intermedia in November, 1997 and investigated the problems reported by

Intermedia. BellSouth's investigation found that Intermedia sent its orders to a test EDI platform, rather than the production platform. No other problems have been reported since then. As for Intermedia's third complaint, that BellSouth shifts the blame to Intermedia, BellSouth simply has suggested, based on the minimal information provided by Intermedia, that the "lost" orders could be orders with errors.

35. Intermedia states that EDI and LENS are inadequate for orders involving "moves, adds, or changes." (Intermedia at 11). This is not so. EDI, BellSouth's non-discriminatory interface for ordering, allows change orders, while LENS allows supplemental orders.

36. ITC DeltaCom claims that it received rejection notices from BST for 16 percent of the orders it submitted from March to May 1998. (ALTS at 14-15; Rozycki Affidavit (ALTS/ITC DeltaCom) ¶ 9). As mentioned earlier, several representatives of BellSouth met with ITC DeltaCom about a number of issues on July 29-30, 1998. Order errors were discussed. One of the reasons orders were rejected was that one of ITC DeltaCom's account numbers was not changed when an NPA split occurred in Alabama. This has been corrected by BellSouth. Another reason for rejected orders was that ITC DeltaCom was issuing orders via EDI with an extra space in a telephone number field. BellSouth called this problem to ITC DeltaCom's attention.

37. ITC DeltaCom complains about supposed discrepancies in BellSouth's EDI documentation, claming that, as a result, ITC DeltaCom has experienced delays in the development of a customized version of EDI. (Rozycki Affidavit (ALTS/ITC DeltaCom) ¶ 6). Until receipt of ITC DeltaCom's Comments, BellSouth was unaware that ITC DeltaCom was experiencing problems with its implementation of EDI. BellSouth therefore contacted ITC DeltaCom to offer assistance and was told by ITC DeltaCom that there were no issues with the documentation and that it had everything it needed to complete testing. This suggests the disparity between what CLECs are telling the Commission and what is true as a matter of day-to-day operations.

38. MCI and e.spire complain that BellSouth has not demonstrated electronic ordering for UNEs. (MCI at 50; e.spire at 33). This is not true. As stated in my initial Affidavit, Media One had placed 322 electronic orders for interim number portability (INP) via EDI-PC as of May 26, 1998. (Stacy OSS Affidavit, ¶ 91). This figure does include supplemental orders, but is a clear indicator that CLECs do, indeed, have the capability of placing electronic orders for UNEs via EDI.

39. MCI complains that its tests have revealed that BellSouth cannot return electronic firm order confirmations or completion notices for a non-designed unbundled loop. (MCI at 42, 50-51, 54, 60; Green Affidavit (MCI), ¶¶ 97-101, 126-130). This is not true for orders for new service

utilizing designed and non-designed loops. These orders may be entered electronically via EDI and flow through the system without manual intervention. Firm order confirmations and completion notices are electronically generated for new service orders. Although they may be ordered via EDI, provisioning for services reusing non-designed loops will be handled manually. It is important to note, however, that no CLEC has ordered a non-designed loop, manually or electronically.

1. "PARTIAL MIGRATIONS"

40. Both AT&T and MCI complain about the procedures for ordering "partial migrations" (AT&T's term) or "split accounts" (MCI's term). (Hassebrock Affidavit (AT&T) ¶¶ 36-47; Bradbury Affidavit (AT&T) ¶¶ 14, 20, 46-51, 89-109 & Attachments 8-13; AT&T at 36-37; Green Affidavit (MCI) ¶¶ 94-115, 154-155; MCI at 48-50). These types of orders occur when an end user customer chooses a CLEC to provide service for some of its lines, while keeping BellSouth as the carrier for the remainder. CLECs may send resale or UNE orders for initial "partial migrations" via EDI. This was possible with version 6.0 of EDI, and continues to be true with version 7.0. The Stacy OSS Affidavit at ¶ 118 and Exhibit WNS-27 list the resale services and UNEs available via EDI. If the end user customer later decides to move more or all of its lines to its existing CLEC account, that "subsequent partial migration" currently must be ordered manually. This is true for AT&T Digital Link and any other service. Requests for "partial

migrations" occur rarely. When they do occur, they mostly involve complex service orders that are not split accounts.

41. AT&T claims that BellSouth established a "workaround" for version 6.0 of EDI that allowed AT&T to send "subsequent partial migrations" via EDI. AT&T complains that BellSouth withdrew this procedure when it implemented version 7.0 of EDI. (Bradbury Affidavit (AT&T) ¶¶ 14, 20, 46-51, 89-109 & Attachments 8-13; AT&T at 36-37; Hassebrock Affidavit (AT&T) ¶¶ 36-47). This is not true. BellSouth agreed to a "workaround" for three orders during the time that AT&T and BellSouth were testing version 6.0. This "workaround" was never part of the "live" version 6.0 of EDI that AT&T used to transmit orders to BellSouth.

42. AT&T complains that BellSouth failed to provide AT&T with the business rules necessary for AT&T to place manual orders for "subsequent partial migrations." (Bradbury Affidavit (AT&T) ¶¶ 106-109 & Attachments 28-29; Hassebrock Affidavit (AT&T) ¶ 45-46). This also is not true. BellSouth developed rules for this procedure after AT&T accepted BellSouth's proposal for this procedure. BellSouth made every effort to expedite the development of these rules and provided them to AT&T on July 17, 1998 via its account team. Additionally, BellSouth and AT&T met on July 21, 1998 to discuss the process and procedures.